

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

LAUREN ROLLINS,
Plaintiff,

v.

R STREET INSTITUTE,
Defendant.

Civil Action No. 3:22-cv-30059

PLAINTIFF'S ASSENTED-TO MOTION TO EXTEND SCHEDULING ORDER DEADLINES

NOW COMES Lauren Rollins ("Plaintiff"), by and through counsel, and requests that this Court extend the discovery and dispositive motion deadlines set forth in the current Scheduling Order [Dkt. #18] for a 45-day extension of. Defendant assents to this motion. As grounds therefore, Plaintiff states:

1. Under this Court's Order allowing the parties' Joint Motion to Extend Certain Scheduling Order Deadlines [Dkt. #17] ("Joint Motion"), fact discovery must be completed by May 31, 2023.

2. Since the entry of the February 22, 2023 Order, the parties have exchanged further discovery and have scheduled Plaintiff's deposition, which will take place on May 3, 2023.

3. As anticipated by the parties' Joint Motion, Defendant's production has been voluminous.

4. On April 3, Defendant produced approximately 3,862 pages of discoverable documents.

5. On April 26, 2023, Defendant produced a further 1,640 pages of documents, bringing Defendant's total production to 6,472 pages, of which 5,504 were produced within the past four weeks.

6. A complete review of document production is necessary in order to conduct efficient and meaningful depositions.

7. Plaintiff's counsel requires additional time to review Defendant's voluminous discovery production prior to conducting depositions of fact witnesses.

8. As a result, Plaintiff seeks, on consent by Defendant, a 45-day extension of the current discovery deadlines and dispositive motions, as follows:

Litigation Event:	Current Deadline:	Proposed Deadline:
Discovery Complete	May 31, 2023	July 17, 2023
Rule 56 Motions Filed By	July 14, 2023	August 28, 2023

9. With this extension of deadlines, dispositive motion briefing will be complete by October 23, 2023, prior to the presently scheduled dispositive motion hearing date of November 20, 2023, and Plaintiff therefore does not seek to postpone the dispositive motion hearing date.

WHEREFORE, for the above-stated reasons, and in the interests of justice, Plaintiff's counsel requests that her Assented-To Motion to Extend Scheduling Order Deadlines be granted.

Dated: April 28, 2023

/s/ Raymond Dinsmore
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LOCAL RULE 7.1 (A) (2) CERTIFICATION

I, Raymond Dinsmore, counsel for Plaintiff in the above-captioned matter, hereby certify that, pursuant to Rule 7.1 (a)(2) of the Local Rules of the United States District Court of Massachusetts, Plaintiff's counsel has conferred with Benjamin R. Davis of Jackson Lewis P.C. ("Attorney Davis"), counsel for the Defendant, on April 27, 2023 and April 28, 2023, by email regarding this motion, and Attorney Davis informed me that the Defendant assents to this motion.

Dated: April 28, 2023

/s/ Raymond Dinsmore
Raymond Dinsmore

CERTIFICATE OF SERVICE

I, Raymond Dinsmore, hereby certify that this document, filed through the CMECF system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing on September 23, 2022, and to unregistered participants via email:

Benjamin R. Davis
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Jackson Lewis P.C.
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/s/ Raymond Dinsmore

Raymond Dinsmore